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COUNSEL/PARTIES OF RECORD	
MAY 14 2018	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

STEFANY HAZELETT,  
 Plaintiff,

vs.

WAL-MART STORES, INC., a Delaware  
 Corporation ,  
 Defendant.

Case No. 3:17-cv-00274-MMD-VCP

**PROPOSED STIPULATION AND ORDER  
 TO TAKE DEPOSITIONS OUTSIDE  
 CLOSE OF DISCOVERY AND TO EXTEND  
 DISPOSITIVE MOTIONS DEADLINE**

Plaintiff, STEFANY HAZELETT and Defendant, WAL-MART STORES, INC., by and through their respective counsel of record, stipulate and agree to take the deposition of Pansy Renee Husted and the reconvened deposition of Plaintiff Stefany Hazelett on a date after the May 14, 2018 close of discovery. The parties also hereby stipulate and agree to extend the current dispositive motion deadline of June 13, 2018 up to and until July 13, 2018.

**DISCOVERY COMPLETED TO DATE**

To date, the parties have completed the following discovery:

**Plaintiff:**

Plaintiff's Initial Disclosures	September 28, 2017
Plaintiff's First Supplemental Disclosures	October 9, 2017
Responses to First Set of Requests	November 21, 2017

1	Responses to First Set of Interrogatories	November 21, 2017
2	Responses to Second Set of Requests	December 8, 2017
3	Responses to Second Set of Interrogatories	December 8, 2017
4	Plaintiff's First Set of Requests	January 9, 2018
5	Plaintiff's First Set of Interrogatories	January 9, 2018
6	Plaintiff's Second Supplemental Disclosures	February 28, 2018
7	Plaintiff's Third Supplemental Disclosures	March 7, 2018
8	30(b)(6) Deposition – Walmart	April 13, 2018
9	Plaintiff's Fourth Supplemental Disclosures	April 27, 2018
10	<b><u>Defendant:</u></b>	
11	Defendant's Initial Disclosures	September 29, 2017
12	Defendant's First Set of Requests	October 17, 2017
13	Defendant's First Set of Interrogatories	October 17, 2017
14	Defendant's Second Set of Requests	November 7, 2017
15	Defendant's Second Set of Interrogatories	November 7, 2017
16	Defendant's First Supplemental Disclosures	December 11, 2017
17	Responses to First Set of Requests	February 20, 2018
18	Responses to First Set of Interrogatories	February 20, 2018
19	Subpoenas to Various Medical Providers	February 23, 2018
20	Supplemental Responses to First Set of Requests	February 21, 2018
21	Defendant's Second Supplemental Disclosures	April 11, 2018
22	Deposition – Stefany Hazelett	April 12, 2018
23	Defendant's Third Supplemental Disclosures	May 1, 2018
24	<b><u>DISCOVERY STILL TO BE COMPLETED</u></b>	
25	Deposition – Bobbie Buist (North Carolina)	May 10, 2018
26	Deposition – Brett Miller (Florida)	May 11, 2018
27	Deposition – Stefany Hazelett (Reconvened)	June 4, 2018 (Proposed)
28	Deposition – Pansy Renee Husted	June 4, 2018 (Proposed)

**REASONS FOR REQUEST**

The parties have engaged in significant written discovery in this case and have met and conferred in good faith throughout the case in order to avoid court intervention in the discovery process. Additionally, the parties have conducted two key depositions in the case and are traveling this week for two additional depositions in North Carolina and Florida. While the parties have attempted to complete discovery under the parameters of the current scheduling order, the instant request, to allow depositions to be taken outside the date of the formal close of discovery and extend the dispositive motion deadline, is necessary because the depositions are critical to the parties preparation for dispositive motions/trial.

Conducting Plaintiff's reconvened deposition on a date after the current discovery deadline is necessary because Plaintiff recently produced a series of documents in this case which are relevant to her claims (April 27, 2018). The parties have already discussed the necessity of the reconvened deposition and met and conferred regarding the parameters of the same. The parties have also discussed the deposition of Ms. Husted, a witness Defendant recently disclosed in this matter (May 1, 2018), and it is also believed to be necessary to the case. The parties have proposed dates on which these two depositions could be taken and the earliest date the schedules of all parties would permit is June 4, 2018. Accordingly, the parties respectfully request that they be given leave to conduct these depositions on a date outside the current discovery period and that the dispositive motion deadline be extended 30 days in light of the same.

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1 This is the parties' first request for an extension of the dispositive motion deadline in this  
2 case and is sought in good faith and not for the purpose of delay.

3  
4 Dated: May 9, 2018

Dated: May 9, 2018

5 Respectfully submitted,

Respectfully submitted,

6  
7 /s/ James P. Kemp

JAMES P. KEMP, ESQ.  
KEMP & KEMP

/s/ Ethan D. Thomas

ROGER L. GRANDGENETT II, ESQ.  
ETHAN D. THOMAS, ESQ.  
LITTLER MENDELSON, P.C.

9 Attorney for Plaintiff  
10 STEFANY HAZELETT

Attorneys for Defendant  
WAL-MART STORES, INC.

11 IT IS SO ORDERED.

12 Dated: May 14, 2018.

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16 UNITED STATES MAGISTRATE JUDGE

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